

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION

In re:	§	Lead Case No. 21-60162-rbk
	§	Second Case No. 21-60163-rbk
DARYL GREG SMITH and	§	
CANADIAN RIVER RANCH, LLC	§	Chapter 11
	§	
Debtors.	§	(Jointly Administered Under
	§	Case No. 21-60162-rbk)

DEBTORS' WITNESS AND EXHIBIT LIST FOR SEPTEMBER 21–22, 2021 HEARING

TO THE HONORABLE RONALD B. KING, CHIEF U.S. BANKRUPTCY JUDGE AND TO ALL PARTIES:

Daryl Greg Smith (“Smith”) and Canadian River Ranch, LLC (“CRR”, with Smith, the “Debtors”) hereby submit this Witness and Exhibit List in support of the hearings to held on **September 21, 2021, at 1:30 p.m.** and **September 22, 2021, at 11:00 a.m.** (prevailing Central Time) (the “Hearings”).

WITNESSES

The Debtors reserve all rights to call any or all of the following as witnesses at the Hearings, including but not limited to by affidavit, declaration or proffer.

1. Daryl Greg Smith;
2. Any witness called or designated by any other party; and
3. Any rebuttal witnesses, as appropriate.

EXHIBITS

The Debtors reserve all rights to introduce and/or request judicial notice of any or all of the following Exhibits as evidence at the Hearings, each as may be amended, and expressly including any filed responses thereto, and any exhibits, schedules, addenda, and any and all other attachments or amendments thereto and thereof:

No.	Description	MARKED	OFFERED	OBJECT	ADMIT
A.	<i>Listing Agreement – Exclusive Right to Sell</i> (Aug. 18, 2020) [Dkt. No. 30, Proposed Order, Ex. 1]				
B.	<i>Retention Agreement</i> (Aug. 1, 2021) [Dkt. No. 155, Ex. B]				
C.	<i>Proposed Second Amendment to the Operating Agreement of Caddoa Creek Ranch, LLC</i> [Dkt. No. 180, Ex. B]				
D.	<i>Daryl Greg Smith’s Amended Schedules and Statement of Financial Affairs</i> [Dkt. No. 39]				
E.	<i>Canadian River Ranch, LLC’s Amended Schedules and Statement of Financial Affairs</i> [Dkt. No. 41]				
F.	<i>Certificate of Fact of Good Standing of Caddoa Creek Ranch, LLC</i> (June 11, 2021) [Dkt. No. 93, Ex. A]				
G.	<i>Special Warranty Deed, Bosque County, Texas</i> (Feb. 7, 2020)				
H.	<i>Quit Claim Deed – Mineral Interests and Mineral Rights, Bent County, Colorado</i> (Feb. 7, 2020)				
I.	Any and all Motions, Notices, pleadings, and other docket items filed of record in the Bankruptcy Case				
J.	Any and all exhibits designated by any other party				
K.	Any and all other exhibits as may be appropriate for rebuttal or impeachment purposes				

RESPECTFULLY SUBMITTED this 17th day of September, 2021.

MUNSCH HARDT KOPF & HARR, P.C.

By: /s/ Davor Rukavina

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ATTORNEYS FOR THE DEBTORS

CERTIFICATE OF SERVICE

The undersigned hereby certifies that, on the 17th day of September 2021, he personally caused true and correct copies of the foregoing Second Amended Witness and Exhibit List to be served by electronic transmission through the Electronic Case Filing System for the United States Bankruptcy Court for the Western District of Texas to each of the below parties.

Eboney Delane Cobb on behalf of Creditor Whitney ISD
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Mark B. French on behalf of Creditor Mark Cochran
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Edwin Paul Keiffer on behalf of Creditor Karen Annette Smith
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Edwin Paul Keiffer on behalf of Defendant Karen Annette Smith
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Scott D. Lawrence on behalf of Creditor Farm Credit of Western Oklahoma
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Morris D. Weiss on behalf of Trustee Gregory S. Milligan
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Additionally, appropriately marked copies in an electronic format of each of the Exhibits listed in the Witness and Exhibit List was also provided to each of the below parties via e-mail. Any other parties wishing to receive copies of the Exhibits can do so by contacting counsel for the Debtors.

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By: /s/ Thanhhan Nguyen
Thanhhan Nguyen, Esq.